



J-U-B ENGINEERS, Inc.

PASSF
Q-5
1.2v1
8/6/84

N.W. Crossing Office Building, Suite 201
2810 West Clearwater Avenue

Kennewick, Washington 99336

Telephone: (509) 783-2144

August 6, 1984

Mr. Mike Mattingley, President
Resource Recovery Corporation
5501 Airport Way South
Seattle, Washington 98108

RE: DISPOSAL OF RHONE POULENC 2-4D WASTES

Dear Mr. Mattingley:

I am writing in response to EPA's July 11, 1984 letter on Dioxin. Some of Rhone-Poulenc Chemical Company's 2-4D waste residues were hauled by your firm to the Pasco Sanitary Landfill.

Mr. Dietrich has not accepted any Rhone-Poulenc wastes since 1973. He did accept 588 drums in 1972 and 4,492 drums in 1973.

Mr. Dietrich would like you to mention that the Pasco Sanitary Landfill is totally separate from Resource Recovery now when you respond to EPA.

I have responded to the items in Enclosure A for Mr. Dietrich. If you have any questions about the disposal of these wastes, you can call Mr. Dietrich at (509) 547-4802.

If you have any questions on the sampling, analysis or surveying done at the landfill, please call me at (509) 783-2144.

Sincerely,

John A. Zillich
Waste Management and
Environmental Specialist

JAZ/lc
Enclosures

USEPA SF



1371128

AUG - 9 1984

Enclosure A

1. Person to be contacted for information pertaining to this questionnaire:

<u>Name</u>	<u>Title</u>	<u>Telephone</u> (include area code)
<u>JOHN ZILLICH</u>	<u>WASTE MANAGEMENT SPECIALIST</u>	<u>1-509 - 7832144</u>

2. Disposal Site Name: PASCO SANITARY LANDFILL

3. Disposal Site Address: P.O. BOX 424
Street

<u>PASCO</u>	<u>WASH</u>	<u>99301</u>
City	State	Zip

Latitude/Longitude of Plant: SECTIONS 15 & 22 T9N R30E
(If unknown, a full description of location for the purpose of plotting on U.S.G. S. maps)

4. Company Name: PASCO SANITARY LANDFILL

5. Company Address: PO BOX 424
Street

<u>PASCO</u>	<u>WASH</u>	<u>99301</u>
City	State	Zip

6. If this site was acquired or leased from another owner, identify date and lessor or former owner.

Name: _____

Address: _____
Street

_____ City	_____ State	_____ Zip
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Month: _____ Year: _____

7. Date of Disposal Site Operation: 1958 to PRESENT
THE RHONE - POULENC WASTE WAS TAKEN IN 1972 & 1973.
8. Has there ever been an uncontrolled fire, burning, or spill of waste material or other similar event at the site? Yes No ✓

If yes, please provide date(s) NONE THAT WOULD HAVE
and description: AFFECTED THE 2-4 D WASTE

9. Background Environmental Data

- (A) Describe subsurface soils and approximate depth intervals at which they occur in disposal areas. SEE FIGURE 3

(B) Depth of landfill 30' MAXIMUM

(C) Depth to groundwater (wet season). 60 - 70'

(D) Is there a containment liner? Yes No ✓

Type and Integrity

(E) Wells in Area--Number of Wells NUMEROUS IRRIGATION WELLS

Depth of Wells 50-100' DEEP SURROUND THE SITE SEE
FIGURE
9

(F) Direction of groundwater flow (if known) SOUTHEAST

(G) Have there or are there samples being taken from the site?

Yes ✓

No

Soil ☐

Sediment ☐

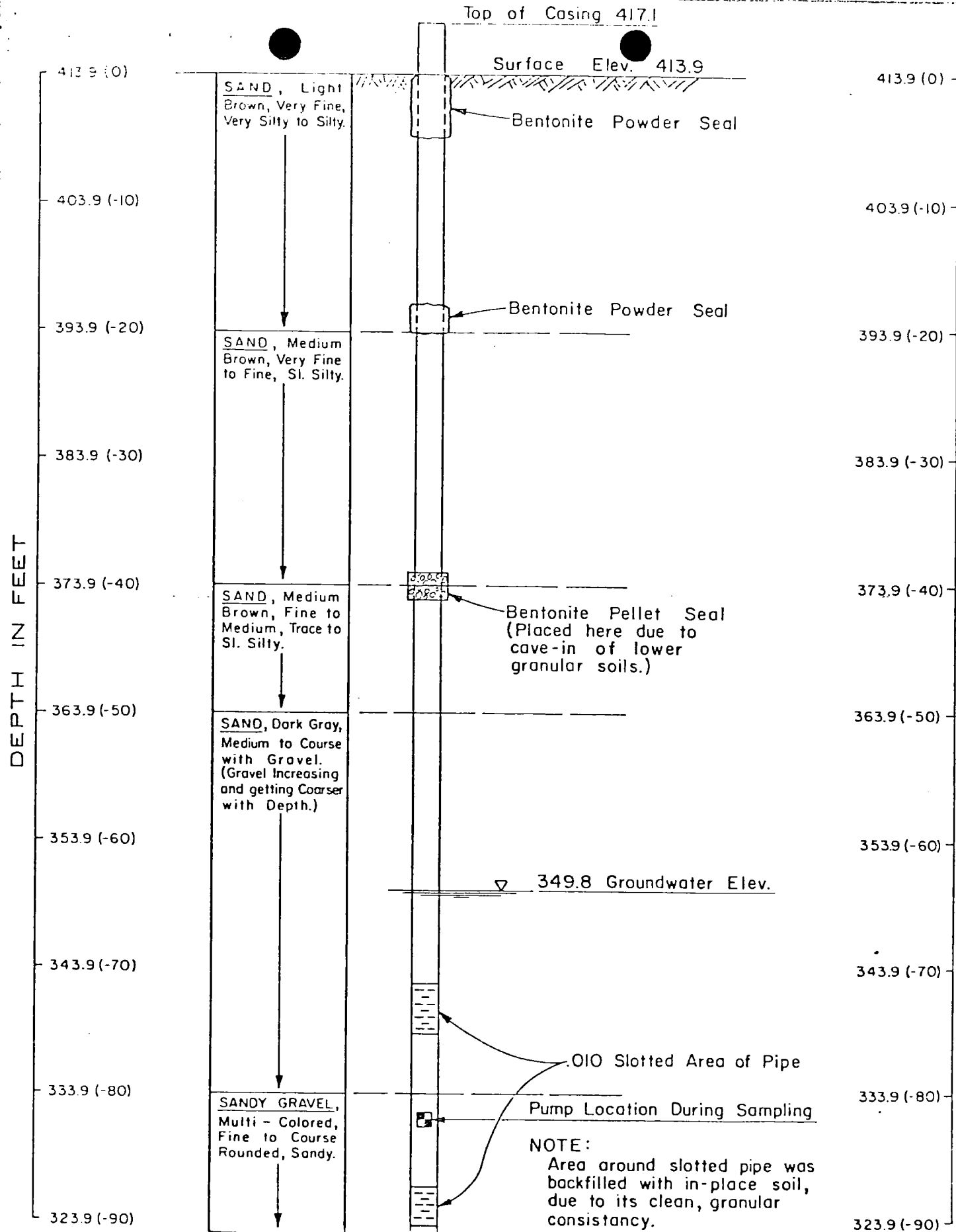
Groundwater ☒

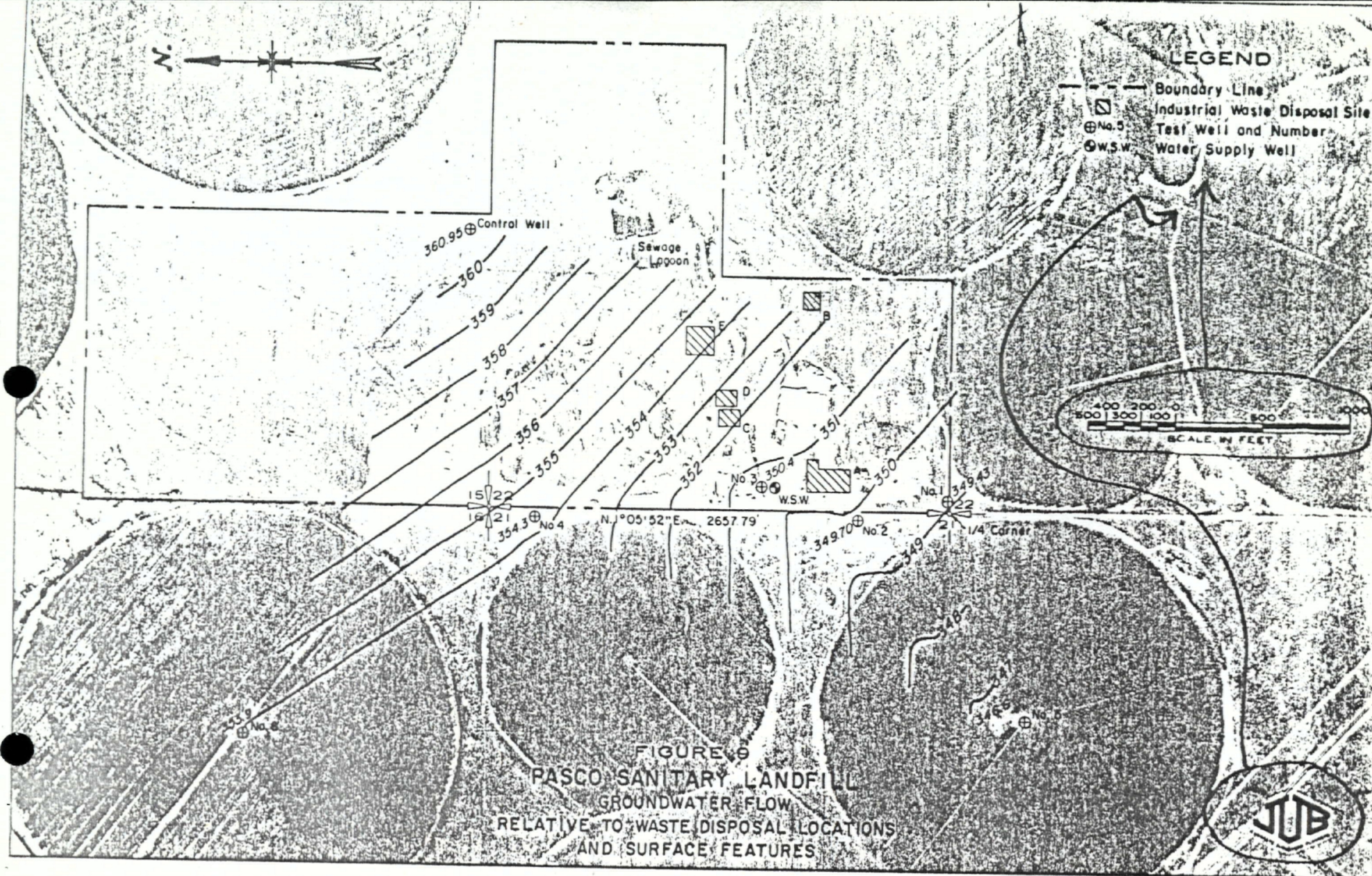
Surface Water ☐

Taken By JOHN ZILICH

Results Obtainable Through JOB ENGINEERS 2810 W CLEARWATER
KENNEWICK WASH SEE TABLE 1
ATTACHED

10. Complete Tables 1 and 2. Make additional copies as necessary.





COMPARISON OF GROUNDWATER QUALITY TO HEALTH EFFECT LIMITS

The upgradient control well (unaffected by landfill operations) and the down gradient wells 1-3 were sampled on February 17 and 18, 1982. Well #4 was installed later and was sampled December 29, 1982. The results of this effort are presented in Table 1 below.

TABLE 1

EPA HEALTH EFFECT LIMITS AND CONCENTRATIONS OF MATERIALS IN GROUNDWATER AT THE PASCO LANDFILL

	Well 1	Well 2	Well 3	Well 4	Upgradient Control Well	EPA Allowable Contaminant Level
Arsenic*	<.01	<.01	<.01	<.010	<.01	.05
Barium*	<.1	<.1	<.1	<.5	<.1	1.0
Cadmium*	<.001	<.001	<.001	<.001	<.001	.01
Chromium*	<.005	<.005	<.005	<.005	<.005	.05
Lead*	<.005	<.005	<.005	<.005	<.005	.05
Mercury*	<.0005	<.0005	<.0005	<.0005	<.0005	.002
Nitrate (N)*	4.79	4.13	4.90	4.45	5.22	10.00
Selenium*	<.005	<.005	<.005	<.005	<.005	.01
Silver*	<.005	<.005	<.005	<.005	<.005	.05
Fluoride*	0.27	0.30	0.45	0.40	0.37	1.80
Coliform**	<2	<2	<2	--	<2	3
Lindane***	<.02	<.02	<.02	<.07	<.04	4
Endrin***	<.05	<.05	<.05	<.18	<.1	0.2
Methoxychlor***	<.1	<.1	<.1	<.90	<.2	100
Toxaphene***	<2	<2	<2	<.18	<4	5
2,4-D***	<5	<5	<5	<4	<10	100
Silvex***	<.5	<.5	<.5	<4	<1.0	10

*mg/l

**Organisms/100ml

***ug/l

The sampling results showed that these materials were, in large part, below detection limits, and in all cases were below allowable contaminant levels. Therefore, the solid waste disposal activities pose no reasonable probability of adverse effects on health or the environment.

TABLE 1 WASTE ORIGIN AND CHARACTERISTICS

Date(s)	Waste Hauler Name/Address	Waste Characteristics			
		Chemical Composition (if known) (1)	Solid, Liquid, Sludge	Process Origin (if known)	Quantity (Drums, Gallons, Tons, etc.)
1972-1973	Resource Recovery Corp. 5501 Airport Way So. Seattle, WA 98108	DCP tar	Sludge	* dichlorophenol distillation	1914 bbls
"	"	MCPA tar	Sludge	* MCPA Production	2813 bbls
"	"	tar	Sludge	* Assumed to be DCP and/or MCPA tar	74 bbls
"	"	Other	Sludge & Solids	* Mixed sources	449 bbls
DATA BASED ON RESOURCE RECOVERY RECORDS					
* SEE ATTACHED JUNE 28, 1973 LETTER FROM RHODIA PROVIDING DESCRIPTION OF WASTES					

(1) For chemical names, see 49 CFR, Part 172.101, Column 2, or 40 CFR, Parts 261.32, 33

TABLE 2 DISPOSAL METHODS

Dates of Disposal On-Site	Disposal Method (secure landfill, burial, trenching surface impoundment, drummed storage, surface dis- charge, injection, etc.)	Location(s) (provide maps, diagrams, drawings, photos as appropriate)	Subsequent Soil Disturbances (construction, regrading, etc.)
	SEE QUESTIONNAIRE PREPARED BY PASCO SANITARY	LANDFILL	

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		Chemical Composition (if known) (1)	Solid, Liquid, Sludge	Process Origin (if known)	Quantity (Drums, Gallons, Tons, etc.)
1972-1973	RESOURCE RECOVERY CORP. 5501 AIRPORT WAY SEATTLE WASH 98108	2,4 D MANUFACTURING RESIDUES	SLUDGE	2,4 D MANUFACTURING WASTE	5,080 - 55 GAL DRUMS

(1) For chemical names, see 49 CFR, Part 172.101, Column 2, or 40 CFR, Parts 261.32, 33

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1972 & 1973	SECURE LANDFILL DRUMS WERE STACKED AND COVERED WITH SOIL	APPROX. LOCA. ON FIGURE 9 - ACTUAL LOCATION DETERMINED BY SURVEY AND AERIAL MAPPING	NONE - SEE CURRENT SOIL ELEVATIONS ON ATTACHED BLUEPRINT

MAP OF SURVEY

for
RESOURCE RECOVERY, Inc.

ENGINEER'S CERTIFICATE

THIS MAP CORRECTLY REPRESENTS A SURVEY MADE UNDER MY DIRECT SUPERVISION IN CONFORMANCE WITH THE SURVEY RECORDING ACT, CHAPTER 50, LAWS OF 1973, AT THE REQUEST OF RESOURCE RECOVERY, INC. IN JUNE 1980

Allen O. Stanley
ALLEN O. STANLEY WASH. REG. NO. 1890

6-5-80
DATE



AUDITOR'S CERTIFICATE

FILED FOR RECORD THIS 16 DAY OF JUNE 1980, AT 2:42 PM, IN BOOK 7 OF SURVEYS AT PAGE 272 AT THE REQUEST OF

FRANKLIN COUNTY AUDITOR

FEE No. #02472

DESCRIPTIONS

THE FOLLOWING DISPOSAL SITES ARE ALL LOCATED IN THE W $\frac{1}{2}$ OF THE NW $\frac{1}{4}$ OF SECTION 22, T. 9 N., R. 30 E., W.M., FRANKLIN COUNTY, WASHINGTON, MORE PARTICULARLY DESCRIBED AS FOLLOWS:

SITE 'A'

COMMENCING AT THE WEST $\frac{1}{4}$ CORNER OF SAID SECTION 22; THENCE N 01° 05' 52" E, ALONG THE WEST LINE OF SAID SECTION 22, A DISTANCE OF 649.53 FT.; THENCE EAST 187.81 FT. TO THE TRUE POINT OF BEGINNING; THENCE N 89° 30' 04" E A DISTANCE OF 195.22 FT.; THENCE S 00° 05' 59" W A DISTANCE OF 67.02 FT.; THENCE S 86° 03' 08" W A DISTANCE OF 79.88 FT.; THENCE S 02° 18' 49" W A DISTANCE OF 210.37 FT.; THENCE N 88° 13' 04" W A DISTANCE OF 103.42 FT.; THENCE N 05° 33' 36" W A DISTANCE OF 277.78 FT. TO THE TRUE POINT OF BEGINNING. CONTAINING 36,810 SQ. FT. MORE OR LESS.

SITE 'B'

COMMENCING AT THE WEST $\frac{1}{4}$ CORNER OF SAID SECTION 22; THENCE N 01° 05' 52" E, ALONG THE WEST LINE OF SAID SECTION 22, A DISTANCE OF 644.17 FT.; THENCE EAST 1808.79 FT. TO THE TRUE POINT OF BEGINNING; THENCE N 87° 38' 36" E A DISTANCE OF 82.57 FT.; THENCE S 00° 53' 44" W A DISTANCE OF 91.96 FT.; THENCE N 83° 55' 18" W A DISTANCE OF 80.50 FT.; THENCE N 04° 04" W A DISTANCE OF 79.94 FT. TO THE TRUE POINT OF BEGINNING. CONTAINING 6,762 SQ. FT. MORE OR LESS.

SITE 'C'

COMMENCING AT THE WEST $\frac{1}{4}$ CORNER OF SAID SECTION 22; THENCE N 01° 05' 52" E, ALONG THE WEST LINE OF SAID SECTION 22, A DISTANCE OF 1583.55 FT.; THENCE EAST 488.78 FT. TO THE TRUE POINT OF BEGINNING; THENCE N 87° 31' 52" E A DISTANCE OF 94.02 FT.; THENCE S 01° 27' 57" E A DISTANCE OF 127.00 FT.; THENCE S 80° 58' 25" W A DISTANCE OF 94.47 FT.; THENCE N 00° 32' 06" E A DISTANCE OF 128.00 FT. TO THE TRUE POINT OF BEGINNING. CONTAINING 11,768 SQ. FT. MORE OR LESS.

NOTE: ALL OF THE W $\frac{1}{2}$ OF NW $\frac{1}{4}$ OF SECTION 22 IS UNDER THE SAME OWNERSHIP. THESE PARCELS ARE FOR MANAGEMENT PURPOSES ONLY.

OF SAID SECTION 22; THENCE N 01° 05' 52" E, A DISTANCE OF 1336.37 FT.; THENCE BEGINNING; THENCE N 07° 41' 04" E A DISTANCE OF 126.37 FT.; THENCE S 89° 02' 48" W A DISTANCE OF 127.24 FT. TO THE TRUE

R OF SAID SECTION 22; THENCE N 01° 05' 52" E, A DISTANCE OF 1577.93 FT.; THENCE BEGINNING; THENCE N 07° 15' 19" E A DISTANCE OF 180.23 FT.; THENCE S 85° 31' 16" W A DISTANCE OF 105.48 FT. TO THE TRUE



A.D. STANLEY &
ASSOCIATES INC.
CONSULTING ENGINEERS
LAND SURVEYORS
PASCO, WASHINGTON

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MAP SHOWING 2-4 WASTE DISPOSAL SITE.



Region 10
1200 Sixth Ave.
Seattle, WA 98101